

**ORIGINAL**

**RECEIVED**

**DEC 19 1991**

Federal Communications Commission  
Office of the Secretary

Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

**ORIGINAL**  
FILE

In The Matter of )  
 )  
Advanced Television Systems )  
and Their Impact Upon the )  
Existing Television Broadcast )  
Service )

MM Docket No. 87-268

COMMENTS OF COMSAT VIDEO ENTERPRISES, INC.

COMSAT Video Enterprises, Inc. (CVE) hereby files its comments on the Commission's Notice of Proposed Rule Making (Notice) in the above-captioned proceeding which proposes policies and rules for implementing advanced television (ATV) service in the United States. CVE is a wholly-owned subsidiary of Communications Satellite Corporation and operates a private satellite network for the distribution of video programming to over 1700 hotels.

CVE is responding to the Notice because of its interest in the possibility of transmitting ATV via satellite. CVE's comments are confined to the issues raised in Section VII (Other Matters), paragraph B, in which the Commission requests comments on the extent to which it should encourage compatibility of a terrestrial broadcast ATV system with other media, including satellite transmission.

0+5

## Compatibility

We support the findings of the Advanced Television Systems Committee (ATSC). The ATSC Technology Group on Distribution, through its Specialists Group on Interoperability and Consumer Product Interface, issued a Status Report on its work in early 1991 (ATSC Document T3/S2-0047, 20 August 1990, revised December 31, 1990). The following quotes are relevant:

From page 2, under "Background."

"As the United States moves toward the adoption of standards for a terrestrial broadcast ATV service, it is important to recognize that ATV services also will be provided by the alternate media. Since these media have differing needs as well as differing technical and regularity constraints, it is important to insure coordination and cooperation among all media in the development of standards so that program material delivered by any one medium also can be easily delivered by all other media and so that consumer receivers can be easily interfaced to all possible media. If this is not done, expensive conversion equipment might be required to exchange programming between media and, worse yet, consumer television receivers might require complex, and potentially user-unfriendly, interfact boxes to receive programs from the alternate media."

From page 3, under "Activities of T3/S2"

"Early in our work, T3/S2 realized that the alternate media were free to choose ATV standards totally unrelated to those developed for terrestrial broadcast. We concluded that such a scenario was both unwise and unlikely, and in any event, unless and until some medium chose such a standard, there was little if anything we could do to deal with its interoperability with other media. Recognizing that the various media will employ different modulation methods and may format and condition the signals for transmission differently, we concluded that the requirements for interoperability and consumer product interface would be most easily met if all media were to adopt substantially the same baseband video signal format."

In summary, CVE recognizes the importance of interoperability of consumer television devices to enable processing and display of television signals from a multiplicity of delivery media; and we recognize the importance of interoperability among media so that television signals intended for delivery by a given medium can be easily transcoded for delivery by other media. We believe that interoperability can best be achieved if a common television baseband signal format were adopted for all media.

#### Satellite Testing

The Advanced Television Test Center (ATTC) in association with CableLabs has a process in place for testing the proponent ATV systems for terrestrial broadcast and cable applications. We feel that it is also important that tests be conducted for satellite transmission. We are aware that the Satellite Broadcasting and Communications Association (SBCA) is presently formulating a plan for satellite testing in coordination with the proponents and ATTC. CVE urges the Commission to encourage these tests with the objective of having results available in time to be considered by SS/WP4 of the FCC Advisory Committee on ATS as part of their decision making process in recommending an ATV standard.

Respectfully submitted,

COMSAT Video Enterprises, Inc.

By:   
Robert A. Mansbach  
Its Attorney

950 L'Enfant Plaza, S.W.  
Washington, D.C.  
(202) 863-6163

December 19, 1991